

MATTHEW D. SEGAL (SB #190938)  
[matthew.segal@stoel.com](mailto:matthew.segal@stoel.com)  
NICHOLAS D. KARKAZIS (SB #299075)  
[nicholas.karkazis@stoel.com](mailto:nicholas.karkazis@stoel.com)  
STOEL RIVES LLP  
500 Capitol Mall, Suite 1600  
Sacramento, CA 95814  
Telephone: 916.447.0700  
Facsimile: 916.447.4781

Attorneys for Defendants  
P. Gill Obstetrics & Gynecology Medical Group, Inc.;  
Parampal K. Gill, M.D.; Jasbir S. Gill, M.D.

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA AND STATE  
OF CALIFORNIA ex rel. GAIL JOSEPH, M.D.,

Plaintiff,

v.

P. GILL OBSTETRICS & GYNECOLOGY  
MEDICAL GROUP, INC., a California  
professional corporation; PARAMPAL K. GILL,  
M.D., an individual; JASBIR S. GILL, M.D., an  
individual,

Defendants.

Case No. 2:21-cv-0554-KJM-AC

STIPULATION EXTENDING  
DEFENDANTS' DEADLINE TO  
RESPOND TO COMPLAINT AND  
CONTINUE STATUS (PRETRIAL  
SCHEDULING) CONFERENCE;  
ORDER

1 This stipulation (“Stipulation”) is entered into by and among Plaintiff GAIL JOSEPH, M.D.  
2 and Defendants P. GILL OBSTETRICS & GYNECOLOGY MEDICAL GROUP, INC.;  
3 PARAMPAL K. GILL, M.D.; JASBIR S. GILL, M.D. (jointly, “Defendants”) (collectively  
4 “Parties”), through their respective counsel.

5 Recitals

6 1. By entering into this Stipulation, neither Plaintiff nor Defendants waive or concede  
7 any right not specifically addressed herein.

8 2. The original date for Defendants to file a response to the Complaint was February 1,  
9 2022.

10 3. The Parties agreed to an initial stipulation extending Defendants’ time to respond to  
11 March 3, 2022, pursuant to Local Rule 144.

12 4. Defendants’ response to the Complaint is currently due on March 3, 2022.

13 5. The Status (Pretrial Scheduling) Conference is currently set for April 7, 2022, at  
14 2:30 PM.

15 6. The discovery cutoff date, last date for hearing motions, pretrial conference date,  
16 and trial date have not yet been set.

17 7. The Parties agree that Defendants’ deadline to respond to the Complaint shall be  
18 extended by 30 days out of professional courtesy in light of Defendants’ counsel’s ongoing,  
19 preliminary investigation into the allegations in the Complaint and as a result of Defendants’  
20 retention of new counsel to assist in the handling of the matter.

21 THEREFORE:

22 **IT IS STIPULATED:**

23 1. The current deadline of March 3, 2022, for Defendants to respond to Plaintiff’s  
24 Complaint is extended 30 days and a response shall be filed by or on April 4, 2022.

25 2. The Status (Pretrial Scheduling) Conference currently scheduled for April 7, 2022,  
26 is continued to May 9, 2022.

1 Dated: March 2, 2022

STOEL RIVES LLP

2  
3 By: /s/ Nicholas D. Karkazis  
4 MATTHEW D. SEGAL  
5 NICHOLAS D. KARKAZIS  
6 Attorneys for Defendants  
P. Gill Obstetrics & Gynecology Medical  
Group, Inc.; Parampal K. Gill, M.D.;  
Jasbir S. Gill, M.D.

7 Dated: March 2, 2022

THE BRINEGAR LAW FIRM

8  
9 By: /s/ Matthew Brinegar  
10 MATTHEW BRINEGAR  
11 Attorneys for Relator/Plaintiff  
12 Gail Joseph, M.D.  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**ORDER**

The court has reviewed the parties' Stipulation, ECF No. 15, and good cause appearing hereby **orders**:

1. The current deadline of March 3, 2022, for defendants to respond to plaintiff's Complaint is extended 30 days. Defendant shall respond on or before April 4, 2022.

2. The Status (Pretrial Scheduling) Conference currently scheduled for April 7, 2022, is continued to May 5, 2022, at 2:30 p.m. with the filing of a joint status report due fourteen (14) days prior.

DATED: March 14, 2022.

  
CHIEF UNITED STATES DISTRICT JUDGE